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Case ref ID 15967

REMARKS

I. Objections to Specification

5 The first paragraph of the specification has been amended to include the US application serial numbers as requested.

II. Claim Objections

10 In response to the objections and rejections, amendments have been made according to the Examiners proposals apart from claim 16 which has been amended to clarify that it covers nodes suitable for use as part of a network, rather than limiting the wording to nodes in a network, so that it explicitly covers nodes produced by a manufacturer before installation, for example. This follows common claim drafting practice.

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III. Claim Rejections Section 101

20 Regarding the rejections relating to abstract ideas, claims 13 and 14 have been amended for clarification. They now recite method steps of using the VPN gateway, or the NAT, when communicating between the two or more VPNs and the external network or networks. This indicates a tangible result in the sense of successful communication of information over a telecommunications network. This is not regarded as an abstract idea. As such, if this rejection is maintained, further explanation from the Examiner would be appreciated.

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Claim 17 has been amended to recite a computer readable medium following established practice.

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IV. Claim Rejections Section 102(b)

5 Claims 18 and 19 have been cancelled without prejudice. Claim 11 has been amended as suggested.

Regarding the rejections for anticipation by the Sonicwall document the publication date of this document is not clear. Page 1 identifies a copyright notice date of 2004. The filing date of the present application September 2003, well before the 2004 copyright date. Even if the software is titled
10 Sonicwall 2002, as is common knowledge from e.g. "Microsoft windows 2000", the title of software is not a reliable indicator of a publication date of a related guidebook for the software. Accordingly, if this rejection is maintained, some evidence of an earlier publication date must be provided.

Even if Sonicwall were available as a proper reference, it does not disclose all
15 of the features of claim 1. Specifically, claim 1 recites " ... a network address translator (NAT) shared by the VPNs". Sonicwall merely discloses a NAT and a Sonicwall client for use with a VPN. However there is no disclosure teaching or suggestion of the Nortel feature of two or more VPNs sharing a NAT. Similarly, there is disclosure of multiple VPN tunnels, multiple VPN endpoints,
20 multiple remote LANs coupled via the internet to a central gateway. Yet, none of these address, suggest or are consistent with a NAT shared by multiple VPNs.

The Examiner cites page 117 and page 96. Page 96 is said to show multiple tunnels which are said to imply more than one VPN. Applicant however,
25 respectfully disagree. Normally each VPN or LAN would have its own NAT. So without an explicit disclosure, a skilled person would not have any reason for assuming that an NAT would be shared by more than one VPN.

Therefore, Sonicwall cannot anticipate claim 1. Further, there is no disclosure, teaching or suggestion in Sonicwall of this distinctive feature, it cannot be
30 obvious to alter Sonicwall to reach the invention.

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The remaining claims have the same distinctive feature or are dependent on such a claim, and so are allowable acceptable for the same reasons.


Favorable reconsideration is therefore requested.

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Respectfully submitted,

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